

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

January 22, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. William F. Kuntz II, U.S.D.J.
225 Cadman Plaza East
Courtroom 6H North
Brooklyn, NY 11201-1804

Re: Plaza Motors of Brooklyn, Inc., et al. v. Cuomo, et al.
Case No.: 1:20-cv-4851 (WFK) (SJB)

Dear Judge Kuntz:

This firm represents the Plaintiffs in the above-referenced case. Plaintiffs write to respectfully request leave to file excess pages of their opposition papers to Defendants' separate motions to dismiss in this case. Pursuant to ¶ III(F) of this Court's Individual Motion Practices and Rules, memoranda of law are limited to twenty-five (25) pages. Plaintiffs request leave to file up to thirty-five (35) pages.

Plaintiffs respectfully submit that the additional pages requested are necessary to address the significant aspects of Defendants' separate arguments – contained in two (2) separate briefs – in support of their respective motions to dismiss.

Accordingly, Plaintiffs submit that good cause exists for this Court to grant Plaintiffs' requested relief. Consistent with ¶ III(G) of this Court's Individual Motion Practices and Rules, Plaintiffs shall serve their opposition papers on Defendants without filing same until the motion is fully briefed and only file a cover letter with the Court indicating service has been made.

Plaintiffs thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
January 22, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

Jamie S. Felsen, Esq.
Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 328-0082 (facsimile)
jamiefelsen@mllaborlaw.com
emanuel@mllaborlaw.com